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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DITECH FINANCIAL LLC; FEDERAL
NATIONAL MORTGAGE ASSOCIATION,

Plaintiffs,

vs.

WOODCREST HOMEOWNERS
ASSOCIATION; ABACUS 8, LLC; and
ABSOLUTE COLLECTION SERVICES,
LLC,

Defendants.

CASE NO. 2:16-cv-02636-APG-DJA

**STIPULATION AND
ORDER TO EXTEND REPLY TO
PLAINTIFF'S COMPLAINT (ECF
NO. 1)**

(FIRST REQUEST)

Defendant Abacus 8, LLC (hereafter "Defendant," or "Abacus") by and through its attorneys of record, James W. Fox, Esq. and Michael N. Beede, Esq. of The Law Office of Mike Beede, PLLC, and Plaintiffs Ditech Financial LLC and Federal National Mortgage Association (hereafter, collectively "Plaintiffs"), by and through their attorneys of record, Melanie D. Morgan, Esq. and Scott R. Lachman, Esq., of Akerman LLP hereby stipulate to extend the time for Abacus to file a response to Plaintiffs' Complaint (ECF No. 1) by **twenty-one days (21), from the date of this filing, to October 17, 2019**. The extension is necessary as Abacus has only recently retained counsel, and Defendant's attorneys require this extension to review pertinent information regarding this matter to properly draft an appropriate response. The parties have agreed to this extension in the interest of fairness and professional courtesy. Therefore, the parties agree that good cause supports an extension and the extension is not for purposes of delay or any other bad

1 faith purpose. This is the first request for an extension of the deadline to file a response to ECF
2 No. 1.

3 The new deadline for Abacus to file a response to ECF No. 1 will be to **Thursday,**
4 **October 17, 2019.**

5 IT IS SO STIPULATED.

6
7 DATED this 26th day of September, 2019.

DATED this 26th day of September, 2019.

8 THE LAW OFFICE OF MIKE BEEDE, PLLC

AKERMAN, LLP

9 By: /s/ Michael Beede

By: /s/ Scott Lachman

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Federal National Mortgage Association*

Case Name: Ditech Financial LLC; Federal
National Mortgage Association v. Woodcrest
Homeowners Association; et al.

Case Number: 2:16-cv-02636-APG-DJA

ORDER

The Court, having reviewed the stipulation of the parties, and good cause appearing
therefore,

IT IS HEREBY ORDERED that the time for Abacus 8, LLC to file a response
to ECF No. 1 be extended by 21 days from September 26, 2019. The new deadline for Abacus 8,
LLC to file its response shall be October 17, 2019.

IT IS SO ORDERED.

Dated this 30th day of September, 2019.



Daniel J. Albregts
United States Magistrate Judge

Submitted by:
THE LAW OFFICE OF MIKE BEEDE, PLLC

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and that I am not a party to, nor interested in, this action. On the 26th day of September, 2019, I did cause a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND REPLY TO PLAINTIFF'S COMPLAINT (ECF NO. 1) (FIRST REQUEST)** to be served upon all parties involved in this litigation by the method indicated:

☐ U.S. Mail

☐ U.S. Certified Mail

☐ Facsimile Transmission

☐ Federal Express

☒ Electronic Service via CM/ECF

☐ E-Mail

By: /s/ Michael Madden
An Employee of The Law Office of Mike Beede, PLLC